Routine Access Policy

Audit Report

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TABLE OF CONTENTS

		Page
1.0	Background	1
2.0	Audit Objectives and Scope	1
2.1	Audit Scope	1
2.2	Audit Procedures	1
3.0	Observations and Recommendations	2
3.1	Routine Access Policy - Status Summary	2
3.2	Compliance with Template and Guidelines	2
3.3	Web Site Visibility	2
4.0	Conclusion	3

1.0 Background

The Freedom of Information and Protection of Privacy (FOIPOP) Act provides applicants an opportunity to seek records from"public bodies" subject to applicable fees. Often records are provided to FOIPOP applicants in their entirety or with minimal information severed in accordance with the exemption provisions of the legislation. One of the primary objectives for the establishment of Routine Access Policies was that an informal process could significantly reduce the administrative time and effort associated with submitting formal applications.

The "Routine Access Policy" was approved as a means to address the administrative burden involved in processing FOIPOP applications for certain types of records. Also, it adds a greater certainty of access to records for those who request information and greater accountability of "public bodies". The "Routine Access Policy" demonstrates "Public Bodies" are operating in the spirit of openness that was intended by the Act.

2.0 Audit Objective

The audit objective was to ensure all thirty-six "Public Bodies" identified by the Department of Justice, had implemented a Routine Access Policy, by October 23, 2003, and followed a consistent approach in the development of this policy.

2.1 Audit Scope

Our audit scope consisted of the template and guidelines developed by the Department of Justice for use by "Public Bodies" in setting up and implementing a Routine Access Policy, the Routine Access Policies posted by "Public Bodies"on their web sites and for "Public Bodies", without web sites, written copies of their Routine Access Policies.

2.2 Audit Procedures

- ❑ Review the guidelines and template developed by the Department of Justice for setting up and implementing the Routine Access Policy
- ❑ Review the "Routine Access Policy"of each "Public Body" posted on their web site or provided in writing and verify compliance with the guidelines and template developed by the Department of Justice.
- ❑ Select a random sample of the Routine Access Policy developed by individual "Public Bodies", meet with the RAP coordinators of these "Public Bodies" and evaluate the policy using a set of predetermined attributes.

3.0 Observations and Recommendations

3.1 Routine Access Policy - Status Summary

Letters were sent to thirty six "Public Bodies" explaining they were required to implement a Routine Access Policy by October 23, 2003. As of January 28, 2004 :

- thirty two Public Bodies had posted the Routine Access Policy on their web site
- two Public Bodies did not receive the guidelines and templates in sufficient time to allow them to prepare their policies by the required deadline of October 23, 2003
- one Public Body, initially feeling it should be exempt from the requirements of the Routine Access Policy, did not make a determination until October 23, 2003 that it would prepare a policy
- one Public Body did not have a web site and contacted the Department of Justice with this information and subsequently provided a hard copy of the policy

Recommendations

We recommend the Department of Justice take the following actions:

- the two "Public Bodies", not contacted within a time frame permitting implementation of their policies by October 23, 2003, be provided on-going assistance until they have achieved such implementation
- meet with the "Public Body" that had questioned whether the Routine Access Policy applied to them and offer its assistance
- meet with the "Public Body" that does not have a web site to see if there can be a resolution to this problem

3.2 Compliance with Template and Guidelines

A set of attributes were developed to measure compliance, by the "Public Bodies", with the template and guidelines developed by the Department of Justice, in the development of their Routine Access Policies. These attributes were applied to a selected random

sample of Routine Access Policies developed by the "Public Bodies". All of the Routine Access Policies included in our sample complied with the templates and guidelines developed by the Department of Justice.

3.3 Web Site Visibility

Only five web sites, of the thirty-two reviewed contained links to their Routine Access Policy that were highly visible to the general public. There were various degrees of difficulty in locating the Routine Access Policy on the remaining twenty-seven web sites due to the location of the policy within these web sites.

Recommendation

The Routine Access Policy should be highly visible and readily accessible from the home page of each "Public Body's" web site.

4.0 Conclusion

Our review indicated that the policies were developed and implemented on a consistent basis and in accordance with the guidelines and template provided by the Department of Justice, except for the noted "Public Bodies", that were either not notified in a timely manner or interpreted the policy as not being applicable to their unit.